

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

Plaintiff,

As representative of

THE COMMONWEALTH OF PUERTO
RICO

Debtor¹

CIVIL NO.: 17-BK-03283 (LTS)

PROMESA

TITLE III

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DISTRICT COURT
SAN JUAN, P.R.

RESPONSE AND RESERVATION OF RIGHTS IN OPPOSITION TO THE
TWENTYTHIRD OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE
COMMONWEALTH OF PUERTO RICO TO RESOLUTIONS OF ADDITIONAL
AMENDMENT OF THE PROCEDURE OF CASE PROCESSING
[ECF NO. 3804]

TO THE HONORABLE COURT:

COMES NOW creditor **Miriam Ivette Matos Santos, OWN RIGHT**, and respectfully responds in opposition to the Twenty Third Omnibus Objection (Non Substantive) of the Commonwealth of Puerto Rico to Resolution of Additional Amendment of the procedure of case processing [ECF No. 3804] "the Objection"), and states and prays as follows:

1. The Commonwealth of Puerto Rico ("Debtor") has objected to some of creditor

Miriam Ivette Matos Santos' timely filed proofs of claim as amendment.

2. **Miriam Ivette Matos Santos** has filed two proofs of claim pertaining to damages claimed on behalf of his children in the pending State Court case Rosa Lydia Vélez vs. ELA, KPE 1980-1738: Claim No. 30930 by itself and in representation of her daughter **REDACTED** **REDACTED**, and Claim No. 31269 on behalf of her daughter **REDACTED**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

3. However, the claim filed by and for her daughter was subsequently amended by Claim No. 82264 only for the purpose of correcting her name to read: N.M.M.

4. That the claim that should or should have been dismissed is the Claim No. 31269, which was amended by Claim No. 82264 for the purpose of correcting the minor's name.

5. In Debtor's Objection No. 339, Page 69, Prime Clerk Claim No. 30930, **Miriam Ivette Matos Santos** moves the Court to deny Debtor's objection.

6. **Miriam Ivette Matos Santos** expressly reserves any rights in connection therewith and requests that, the non-substantive disallowance requested by Debtor should not prejudice **Miriam Ivette Matos Santos's** rights and claims, which were and are expressly reserved.

RESPECTFULLY SUBMITTED.

In Mayagüez, Puerto Rico, on this 8th day of July 2019.

I HEREBY CERTIFY that on this same date that I have personally submitted and notified a true and accurate copy of the preceding document before the Clerk's Office, United States District Court #150 Chardon Avenue, Federal Building, San Juan, Puerto Rico 00918, and served a copy of the same via fax to Counsel for the Oversight Board and to the Creditors' Committee.



Miriam Ivette Matos Santos
Creditor
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